

1 THE HONORABLE BARBARA ROTHSTEIN
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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

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14 WILDWOOD TOWNHOME OWNERS
15 ASSOCIATION, a Washington Non-Profit
16 Corporation,

17 Plaintiff,

v.

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19 AMERICAN FAMILY MUTUAL
20 INSURANCE COMPANY, S.I., a Wisconsin
21 Company; and DOE INSURANCE
22 COMPANIES 1-10,

23 Defendants.

24 No.: 2:21-cv-01080-BJR

25 STIPULATED MOTION AND ORDER
26 FOR CONTINUING PRETRIAL
LITIGATION DEADLINES

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28 Plaintiff Wildwood Townhomes Owners Association (the “Association”) and
29 Defendant American Family Mutual Insurance Company, S.I. (“AmFam”) stipulate to this
30 motion for a continuance of the pre-trial deadlines and respectfully request a short extension
31 of pre-trial deadlines.

32 Pursuant to LCR 16(b)(6), a scheduling order may be modified “only for good cause
33 and with the judge’s consent.” Good cause exists here because the parties have agreed to
34 enter into mediation of this matter. For purposes of judicial economy, the parties propose that
35 the pretrial deadlines be continued for forty-five days to avoid incurring additional expenses

1 on behalf of the parties should the matter resolve during mediation. No previous extensions
 2 of time have been requested or granted by the Court in this matter, and this extension is not
 3 made for purposes of delay, but rather to permit the parties additional time in an attempt to
 4 resolve this matter amicably without incurring substantial further costs or requiring
 5 additional time and resources on behalf of the Court. No other deadlines or events in this
 6 matter are to be altered. The parties respectfully request that the Court extend the currently
 7 scheduled deadline as set forth Below. A proposed order is included herewith.

Event	Current Deadline	New Deadline
Disclosure of expert testimony under FRCP 26(a)(2) due	8/8/2022	9/22/2022
Discovery completed by	9/7/2022	10/22.2022
All dispositive motions must be filed by this date and noted for consideration no later than the fourth Friday thereafter (see LCR 7(d))	10/7/2022	11/21/2022

14 The Parties believe that there is good cause under Federal Rule of Civil Procedure
 15 6(b) and Local Civil Rule 10(g) for a continuance of certain pretrial deadlines due to the
 16 reasons set forth above.
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1 DATED: July 20, 2022

2 Lane Powell PC

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9 Attorneys for Plaintiff Wildwood
Townhomes Owners Association

ORDER

Based on the above Stipulated Motion, IT IS SO ORDERED that the pretrial deadlines be extended as follows:

Event	Current Deadline	New Deadline
Disclosure of expert testimony under FRCP 26(a)(2) due	8/8/2022	9/22/2022
Discovery completed by	9/7/2022	10/22.2022
All dispositive motions must be filed by this date and noted for consideration no later than the fourth Friday thereafter (see LCR 7(d))	10/7/2022	11/21/2022

No other deadlines or events are altered.

IT IS SO ORDERED this 25th, day of July 2022.

Barbara J Rothstein

THE HONORABLE BARBARA J. ROTHSTEIN